

IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

BERKADIA COMMERCIAL §  
MORTGAGE LLC, §  
Plaintiff, §  
v. §  
CROSS BRIDGE TITLE LLC and §  
OLD REPUBLIC NATIONAL TITLE §  
INSURANCE COMPANY, §  
Defendants. §

Civil Action No. 4:25-cv-2368

**DECLARATION OF KATHRYN E. NELSON**

STATE OF TEXAS §  
COUNTY OF HARRIS §

1. My name is Kathryn E. Nelson. I am of sound mind, over the age of 21, and competent to make this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.

2. I am of counsel for Plaintiff Berkadia Commercial Mortgage LLC (“Berkadia”) in this case and authorized to make this declaration on its behalf. I make this declaration in support of Berkadia’s Request for Entry of Default against Defendant Cross Bridge Title LLC (“Cross Bridge”).

3. Berkadia filed its Original Complaint against Cross Bridge on May 23, 2025. A true and correct copy of the Original Complaint is attached as Exhibit A-1 and incorporated by reference.

4. The Court Clerk issued a summons addressed to Cross Bridge on May 28, 2025. A true and correct copy of the summons is attached as Exhibit A-2 and incorporated by reference.

**EXHIBIT**  
**A**

5. My firm, Berg PC, engaged a process server to serve Cross Bridge with the summons and Original Complaint. A true and correct copy of the return of service executed by the process server is attached as Exhibit A-3 and incorporated by reference. The sworn return of service states that Cross Bridge was served with the summons and Original Complaint by personal delivery on June 4, 2025.

6. According to the Court's Docket, Cross Bridge's answer or responsive pleading was due on June 25, 2025.

7. Cross Bridge has not filed a responsive pleading or otherwise defended the suit, and no extension has been requested.

8. Cross Bridge is not an individual and therefore is neither a minor nor an incompetent person. Cross Bridge is not in military service, active or otherwise.

9. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Houston, Texas on June 26, 2025.

  
KATHRYN E. NELSON